

REMARKS

Reconsideration and allowance are requested. Claims 1, 13, 18, 23 and 30 are amended and claims 2 – 4, 8 – 12, 14 – 16, 19 – 21, 27 – 29 and 31 - 33 are cancelled without prejudice or disclaimer.

Rejection of Claims 3 – 4, 10, 15 – 16, 20 – 21, 28 – 29 and 32 -33 Under Section 103

Applicant has presented arguments in the previous responses to final and non-final office actions regarding the insufficient motivation or suggestion to combine Chu et al. with Morihara et al. These two references were combined in the Office Action to reject claims 3 and 4. Applicant now incorporates the limitations of claims 3 and 4 into the independent claims. However, in the Advisory Action and Final Office Action there was no answer or argument by the Examiner supporting the combination of these references. Accordingly, Applicant respectfully submits that by the clear preponderance of the evidence on record, that there is more evidence against the combination of these references than there is supporting the combination.

In sum, Applicant submits that because of the differences in their subject matter, that one of skill in the art would not have motivation to combine Morihara et al. with Chu et al. As previously explained, Chu et al. focus on video compression and transmission over a 14.4 kbps bandwidth and Morihara et al. are in a completely different context teaching a dictionary in which a character train serving as a process unit upon compression has been registered and stored. Therefore, because one of skill in the art would not be motivated to combine these references, Applicant respectfully submits that the present application is in condition for allowance.

CONCLUSION

Having addressed the rejection of the claims, Applicant submits that the present application is in condition for allowance and a Notice to that affect is respectfully requested.

Respectfully submitted,

Date: June 12, 2006

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